

Haznet Trend and Analysis Report: Narrative Analysis of Haznet Service Provided to CUPAs

Introduction

Haznet is a Department of Toxic Substances Control (DTSC) database with information on over 500,000 annual hazardous waste shipments entered from one million manifests per year. In November 2000, DTSC introduced the Haznet service to the Certified Unified Program Agencies (CUPAs) to request reports and information from this database to facilitate their manifest research work and inspection preparation. Four DTSC staff in the State Regulatory Programs Division (SRPD) have been designated the Manifest Enforcement (ME) team to process such requests from CUPAs (as well as other State agencies, United States Environmental Protection Agency (U.S. EPA), and DTSC employees). The ME team coordinates with Manifest Enforcement Coordinator Ann Carberry of the Statewide Compliance Division (SCD). The information tracked and used in this report represents only official requests submitted by the recognized audience to the ME team for the purposes of providing a service, and does not include any usage by DTSC employees outside of the ME team.

The purpose of this report is to analyze the type, quantity, and distribution of Haznet information that SRPD ME staff has provided, for the purposes of determining the success of the service since it was introduced.

A. Summary and Analysis of Service Provided

Use of DTSC's Haznet service has increased steadily since the service was first introduced in November 2000. A total of 100 requests were processed between November 2000 and October 31, 2001. Use of the service increased following the Northern California CUPA (CalCUPA) Forum Meeting in January 2001, which was the first major introduction of Haznet to CUPAs, the CalCUPA Conference in February 2001, and the mail-outs of jurisdiction-wide data to all CUPAs in January and May of 2001. The number of requests also increased around the times that the Haznet Database Demonstration and Training classes were given. The service remains popular with CUPAs, U.S. EPA, and other State agencies, and is used by several divisions within DTSC as well. Use of the Haznet service has declined recently; a possible reason is that CUPAs are preoccupied with safety and security issues related to the recent terrorist attacks.

B. Number of Requests Per Target Type

The chart shown in Part B shows that Haznet requestors are overwhelmingly interested in information regarding generators of hazardous waste. A market exists for promoting more information on hazardous waste transporters. The lack of requests for information on Treatment, Storage, or Disposal Facility (TSDF) facilities is understandable considering the nature of the data available in Haznet.

C. Analysis of Turnaround Time for Requests

The average Haznet request is processed in a day and a half. Service time improvement is therefore not a likely issue. The fact that the mode is zero, i.e., same-day service is the turnaround time provided most frequently, supports this conclusion. The relatively wide range indicates the variety, complexity, and length of requests received.

D. Number of Haznet Requests by CUPA Region

Eighty-four total requests were received from CUPAs for Haznet information between November 2000 and October 2001. Southern California CUPAs submitted slightly more requests than Northern California CUPAs; however, the sum total of Northern and Central California requests is greater than the total of Southern California requests. The analysis of CUPA Haznet users shows that a handful of CUPAs make the majority of requests, although at least one-third of the CUPAs in the State have used the Haznet service at least once. U.S. EPA Region IX has also made considerable use of the Haznet system and a number of DTSC intra-departmental requests have been received.

To summarize, the Haznet service is reaching a fairly wide audience, and the number of requests received from Northern, Southern, and Central California is quite evenly distributed.

E. Haznet Information Requested by Report Type

The data and bar graphs shown in Part E illustrate several important trends:

- ◆ Manifest Analysis Reports are far more popular with Haznet users than Manifest Enforcement Reports.
- ◆ Several Haznet reports have not been requested or utilized at all, indicating that they are perhaps misunderstood by potential users, have not been explained or promoted well enough by ME staff, are not as useful as the reports that are frequently requested, or a number of other reasons.
- ◆ The high number of requests for several of the reports indicates that the reports are useful and in demand and need only be promoted further.

F. Effectiveness of Haznet Training Program

The correlation between those who attended the Haznet training classes and those who called with Haznet requests is low. Furthermore, several of the training participants, who did call with requests, placed requests before they attended the training. However, use of the Haznet service was at an all-time high during and after the period that the training classes were given.

There are several possible reasons that there is not a significant correlation between Haznet training attendees and Haznet service requestors:

- ◆ CUPAs are unresponsive because they can not use the service themselves.

- ◆ The Haznet training campaign was not much more successful at promoting the service than other means, e.g., the CalCUPA Conference in February and the various CalCUPA forums.
- ◆ The Haznet training provided, while educational, does not provide trainees with enough information on how to prepare and submit meaningful requests.

Note: A number of training attendees did not use the Haznet service as previously described, however, other members of their CUPA called with requests. Therefore, it is likely that Haznet training attendees are sharing the information they receive with their coworkers. For example, nine representatives of Los Angeles County CUPA attended the training; while none of these nine called with Haznet requests, three requests were received from other representatives of that jurisdiction.

Additional Points to Consider

In order to expand the use of the Haznet service, ME staff should consider targeting the CUPAs within Alameda County. Of the eight CUPAs that are in a Coordinating Agency Agreement with Alameda County (Berkeley, Fremont, Hayward, Livermore-Pleasanton, Newark, Oakland, San Leandro, and Union City), none have placed Haznet requests (although some did attend the Haznet training). Given the high profile and number of generators that these CUPAs regulate, it would be feasible to consider a Haznet promotion directed specifically at these CUPAs within Alameda County.

Two custom reports were prepared for CUPA representatives in November 2000 and January 2001. These reports involved manually entering data from a large number of Haznet reports into an Excel spreadsheet program for easier handling and analysis. Custom reports are no longer prepared due to their time-consuming nature and the recent availability of Manifest Analysis Report 9c, which allows Haznet data to be downloaded into Excel or Access files.

All members of the ME team spent a considerable amount of time promoting the Haznet service at the CalCUPA Conference in Universal City in February 2001. Handouts and graphics were prepared to give out to interested parties, and a special booth was set up and managed by ME staff at the conference to officially promote the service to a wide audience of CUPA representatives. The Haznet service has also been informally promoted at a number of CalCUPA Forum meetings (particularly those held in the Central Valley and Northern California), and at two Southern CalCUPA Forum Technical Assistance Group (TAG) meetings (in the current fiscal year).

Besides Haznet reports, many other related services are frequently provided to requestors. The staff time needed to explain and aid in the interpretation of reports, describe the reports to potential requestors, explain and define the various types of EPA Identification numbers, etc., is not represented well in a simple analysis of number of reports distributed. In addition, a considerable amount of time has been spent to prepare Haznet training materials, set up Haznet training times and locations, coordinate with the Generator Information Services Section (GISS) and SCD, set up an

Access database to keep track of the information given out, etc. Finally, ME staff are responsible for checking the validity of the data they provide, and keeping abreast of the ever-expanding number of reports and changes made to the dynamic Haznet system.

The SRPD ME staff's Haznet service to CUPAs is complemented by two other entities within DTSC that share Haznet data with local agencies. Although the contributions of these two groups, GISS and the Task Force Support and Special Investigations Branch (TFSSIB), are not included in the data shown in this report and are not affiliated with SRPD ME staff's promotion of the Haznet service, their services deserve mention.

The GISS Section has processed approximately twenty-four requests from local agencies for information from the Haznet database. ME staff have also worked with GISS to compile electronic manifest data for use by the Orange County CUPA. TFSSIB analyzes and shares Haznet information with CUPAs, State and federal agencies involved in hazardous waste and materials enforcement, as part of a comprehensive program to detect hazardous waste violations and support multi-media and cross agency enforcement. TFSSIB staff's use, analysis, and communication of Haznet data is performed as an integral part of its support of local and federal environmental task forces. TFSSIB use of Haznet data and enforcement reports complements that of GISS, SRPD, and SCD's to provide a wide spectrum of services to the target audience.

Conclusion

The ME team has made a conscientious effort to promote the Haznet service in a variety of ways. The Haznet service provides meaningful data to CUPAs that assists them in targeting hazardous waste generators and transporters who pose a possible threat to human health and the environment. The ME staff will continue to provide their comprehensive service until DTSC's Hazardous Waste Tracking System (HWTS) is available to the public (anticipated to be released in the second half of calendar year 2002). Once the HWTS is publicly available, ME staff will have an anticipated role as manifest data interpretation experts to the same audience they now serve.

Comments from Satisfied Customers

"I have used the service and love the access to these disposal records, especially to develop an enforcement case, or look at general waste generation trends. Just knowing if an EPA Identification number exists is useful in some cases. I have found two sites where their headquarters had a number, but the annex site did not, and of course, they were transporting illegally between the two sites and consolidating wastes."

--- *Virginia St. Jean, San Francisco CUPA*

"The service provided by DTSC's Haznet Manifest Service was efficient and helpful in obtaining the exact information needed by our CUPA. The information obtained has assisted staff in identifying waste types not being manifested and disposed properly by businesses."

--- *Joe Canas, Kern County CUPA*

“The assistance from DTSC with the manifest tracking database has provided a much needed resource to (our) division. The data allows the CUPA to conduct background investigations on the generator’s disposal activities, waste streams and storage times. Also, this data has allowed us as CUPAs to be more confident with the investigation process by knowing the disposal activity, haulers, and the TSDFs. The generator is quite surprised when we, as the local enforcement agency, present them copies of their facility’s manifests that they didn’t provide directly.”

--- *Steve Mattern, Ventura County CUPA*

“Thanks for all your help. The lists you have provided have helped us identify numerous hazardous waste generators in our county for which we had no record.”

--- *John Macedo, Tulare County CUPA*

“... Thank you for the manifests and EPA Identification number information on the latest generator under investigation with the San Diego CUPA. The data you have sent me for this generator and the other sites I have requested this year has been very helpful in our enforcement program. The data has been used to target generators for hazardous waste violations and in enforcement actions in our County. In one case, the U.S. Attorney’s office in San Diego County used the data to show the generator was a Resource Conservation Recovery Act (RCRA) regulated generator on a regular basis, and the defense could not argue the generator was a Conditionally Exempt Small Quantity Generator (CESQG). The generator in question will be sentenced this month in Federal Court for unlawful disposal and transportation of hazardous waste based on the case prepared by San Diego County CUPA.”

--- *John Misleh, San Diego County CUPA*

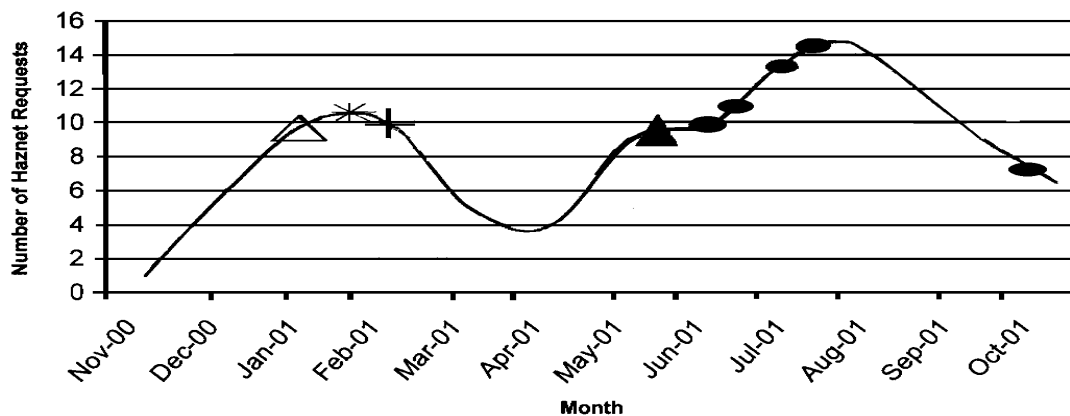
Department of Toxic Substances Control
State Regulatory Programs Division
Haznet Trend and Analysis Report
November 2001

A. Summary and Analysis of Service Provided, Nov. 2000 - Oct. 2001

Total Number of Requests: 100

Month	Number of Requests
Nov-00	1
Dec-00	6
Jan-01	10
Feb-01	10
Mar-01	5
Apr-01	4
May-01	9
Jun-01	10
Jul-01	14
Aug-01	14
Sep-01	10
Oct-01	7

Progressive Analysis of Number of Haznet Requests, November 2000 - October 2001 (Haznet promotion dates indicated)



DTSC, SRPD, HAZNET TREND & ANALYSIS REPORT 11-01

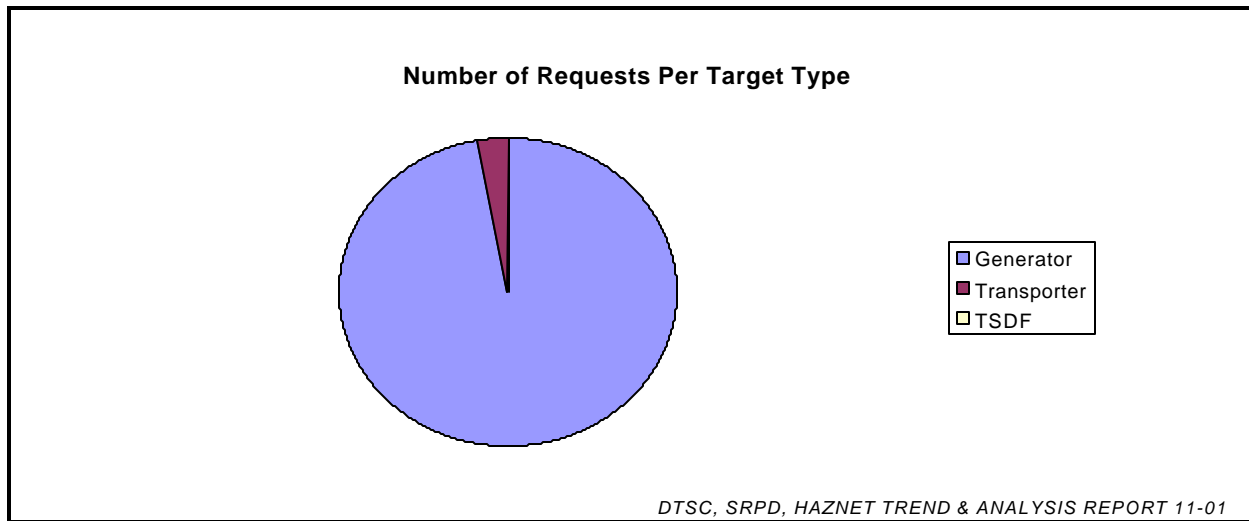
Legend:

- Haznet training
- + Annual CalCUPA Conference
- △ Data lists sent to Northern & Central Cal. CUPAs
- ▲ Data lists sent to Southern Cal. CUPAs
- * CalCUPA Forum Meeting

Haznet training sessions given on June 20, June 26, July 12, July 24, and October 16, 2001

B. Number of Requests Per Target Type

CUPA Target Type	Number of Requests
Generator	97
Transporter	3
TSDf	0



C. Analysis of Turnaround Time for Requests - Mean, Range and Mode

Parameter	No. Days*
Lowest turnaround time	0
Highest turnaround time**	10
Mean	1.47
Range	6.8
Mode	0

Mode = the number that occurs most frequently

Number of days = zero means requests were processed and completed the same day that they were received.

Out of 99 requests**, 36 were provided with same-day service.

* Number of days includes business days only.

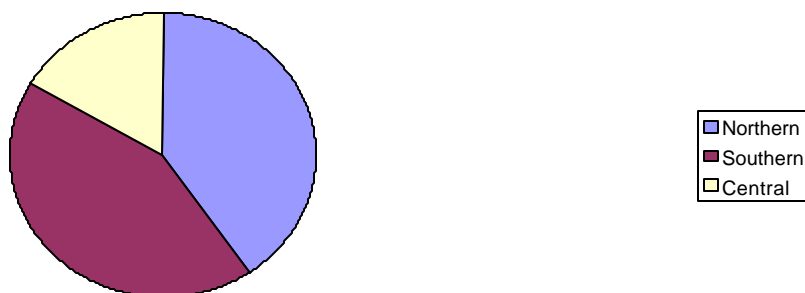
** A Haznet request with a 46-day turnaround time was not included in any of the above calculations, primarily since it is an outlier and would skew and/or misrepresent the rest of the data. The Haznet request with a 46-day turnaround time was not necessarily a long or lengthy request but one for which the requestor indicated he/she didn't need the data anytime soon.

D. Number of Haznet Requests by CUPA Region (North, South, Central)

Total number of Haznet requests by CUPAs/CAs: 84

CUPA Region	No. of Requests
Northern	34
Southern	36
Central	14

Comparative Analysis of Haznet Requests per CUPA Region



DTSC, SRPD, HAZNET TREND & ANALYSIS REPORT 11-01

Tier (By use)	Top CUPA Haznet Users:	No. of Requests
1	Ventura County CUPA	7
2	San Diego County CUPA	6
3	Hesperia City CUPA	5
3	Santa Clara County CUPA	5
3	San Rafael City CUPA	5
4	Oxnard City CUPA	4
4	Tulare County CUPA	4
4	Napa County CUPA	4
5	Santa Rosa City CUPA	3
5	El Segundo City CUPA	3
5	Los Angeles County CUPA	3
	<i>Other frequent users:</i>	
	DTSC (SCD, CIB, SRPD)	8
	U.S. EPA (Region 9 Office)	5

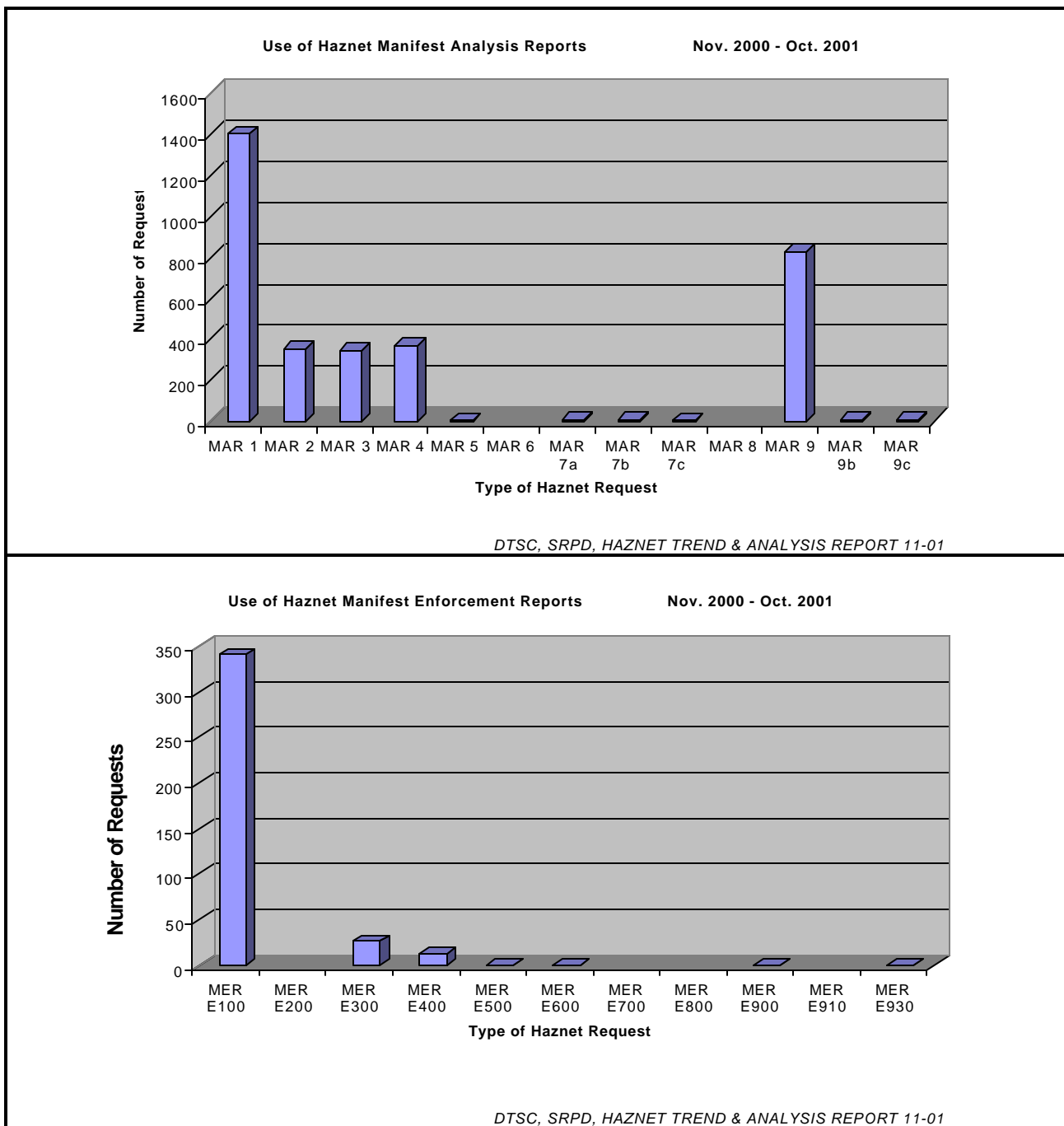
E. Haznet Information Requested by Report Type

MANIFEST ANALYSIS REPORTS (MAR)	
Type of Report	# Requests
MAR 1 - Manifest Count and Total Tons	1402
MAR 2 - Tonnage by Waste Code	350
MAR 3 - Tonnage by Disposal Method	340
MAR 4 - List of Manifests	365
MAR 5 - Find Specific Manifests	1
MAR 6 - Entity Association with a Specific Waste	0
MAR 7a - Total Yearly Tonnage by Waste Code	5
MAR 7b - Total Yearly Tonage by Disposal Code	2
MAR 7c - Total Yearly Tonnage by Entity Type	1
MAR 8 - Correction Letter Manifests	0
MAR 9 - EPA ID Profile	825
MAR 9b - Waste Code by Year Matrix	4
MAR 9c - Manifest Data Extraction (to Excel or Access)	2

MANIFEST ENFORCEMENT REPORTS (MER)	
Type of Report	# Requests
MER E100: Manifest Shipments by Date	341
MER E200: Entities which Interface	0
MER E300: Shipments by Wastecode	27
MER E400: Entity Analysis	13
MER E500: Transporter Activity with Invalid Standing	1
MER E600: Waste Category Analysis	1
MER E700: Waste Category Analysis by Zip Code	0
MER E800: Ranking Report	0
MER E900: Manifest Error Analysis	1
MER E910: Transporters with High Transit Days	0
MER E930: Manifests with Discrepancies	1

OTHER REPORTS	
Type of Report	# Requests
Haznet Facility Search (General CUPA or CA listing)	14
Haznet Facility Search (individual facility)	1
Scanned copies of manifests*	50

*Number of EPA ID#s for which manifest copies sent



F. Effectiveness of Haznet Training Program

Correlation between Haznet Training and Haznet Requests

Training class	No. of participants	No. of requestors*	Percent
Cypress	8	2	25%
Glendale	10	0	0%
Berkeley	11	2	18.2%
Clovis	10	3	30%
San Diego	11	2	18.2%
Sacramento (Headquarters)	<i>cancelled**</i>	<i>n/a</i>	<i>n/a</i>
Sacramento (Region 1 office)	<i>cancelled**</i>	<i>n/a</i>	<i>n/a</i>
Average			18.3%

* Represents the number of people who attended the training who submitted a Haznet request(s).

** Cancelled due to low enrollment figures.